

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS**

ARTURO BRUNO, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

ROBERT DONOHOE, as TRUSTEE OF  
THE TEXAS MEDICAL LIABILITY  
TRUST,

Defendant.

Civil Action No. 1:23-cv-01183-DII

**JOINT MOTION TO STAY**

Pursuant to CV-7(d)(2)(a), Plaintiff Arturo Bruno (“Plaintiff”) and Defendant Texas Medical Liability Trust (“TMLT” or “Defendant”) (collectively “Parties”), by and through their undersigned counsel, hereby submit this Joint Motion to Stay. In support of the Motion, the Parties show the Court the following:

1. Plaintiff filed his Complaint on September 29, 2023, in the United States District Court for the Western District of Texas, concerning an October 2023, data security incident that TMLT experienced.

2. On December 8, 2023, TMLT timely filed its Motion to Dismiss Plaintiff’s Class Action Complaint.

3. After obtaining an extension, Plaintiff then filed his Response to TMLT’s Motion to Dismiss on January 18, 2024.

4. On January 23, 2024, Plaintiff filed an Unopposed Motion for Extension of Time to File Amended Complaint in Accordance with Rule 15(a)(2).

5. The Court granted this Motion on January 23, 2024.

6. Subsequently, Plaintiff filed his First Amended Complaint on February 22, 2024.

7. On March 7, 2024, TMLT timely filed its Motion to Dismiss Plaintiff's Amended Class Action Complaint.

8. Following discussions between Plaintiff and TMLT, the parties agreed to explore resolution of the action through mediation. A mediation was thereafter scheduled with Hon. Wayne R. Andersen (ret.) for April 4, 2024.

9. The Parties move this Court to stay all pending deadlines in this matter until the Monday following forty-five (45) days after the April 4, 2024, mediation, which is May 20, 2024.

10. A stay of this action will not unduly prejudice or present a clear tactical disadvantage to any party, as the Parties consent to and jointly file this Motion. Discovery has not yet started, an initial scheduling conference has not been held, and no trial date has been set. A stay will also promote efficiency and economy of time and effort of the Court.

11. Based on the foregoing, the Parties submit that good cause is shown for the requested stay of all deadlines and that a stay will not unduly delay these proceedings or prejudice any party.

12. The parties have attached a proposed Order to this Motion as Exhibit A.

Wherefore, the Parties respectfully request this Court enter an Order granting their Joint Motion to Stay and stay all pending deadlines until forty-five (45) days after the parties have concluded mediation.

Respectfully submitted this 11<sup>th</sup> day of March 2024.

/s/ Kayleigh Watson

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*\*Admission Pending*

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 11<sup>th</sup> day of March 2024, a true and correct copy of the foregoing document has been served upon all counsel of record via CM/ECF.

/s/ Kayleigh Watson  
Kayleigh Watson